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November 4, 2021

Via ECF

The Honorable Judge Alison J. Nathan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

The Court hereby ADJOURNS the initial pretrial conference to January 21, 2022 at 3:00 PM. The parties are ORDERED to submit a letter 10 days before the conference in accordance with Dkt. No. 5. SO ORDERED.

Re: **Ortiz et al v. Pofi Construction, Corp. et al**
21-cv-7202 (AJN)

Dear Judge Nathan:

We represent the Plaintiffs in the above-referenced matter and we submit this letter motion to respectfully request an adjournment of the November 12, 2021 Initial Status Conference in order for Plaintiffs to determine whether the proper Defendants have been named and ordered to appear in this matter.

Our office has recently been contacted by counsel for the named Defendants who deny that they ever employed Plaintiffs and have provided us with additional information that may be helpful in determining who employed the Plaintiffs. We are in the process of discussing with our clients whether the proper Defendants have been named so that we may further investigate this matter and proceed accordingly with the proper Defendants. **As such, we respectfully request that the Initial Status Conference be adjourned for thirty days so that we may resolve this concern and for time to file an Amended Complaint, if necessary.** This is Plaintiff's first request for an extension of time or an adjournment and this request will not affect any other dates or deadlines. If this request is granted, Plaintiffs can file an Amended Complaint on or December 4, 2021. **SO ORDERED.**

A handwritten signature in black ink, appearing to read "Roman Avshalumov".

We thank Your Honor for her consideration on this matter and remain available to provide any additional information. 11/4/2021

Respectfully submitted,

/s/ Roman Avshalumov
Roman Avshalumov, Esq.

CC (via electronic mail):

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